

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: NORMAN R. WOODBURN
 Date: 6-30-92

Background Facility Information

Facility Name: GNB INCORPORATED
 EPA Identification No.: GAD070330576
 Location (City, State): COLUMBUS, GA.
 Facility Priority Rank: _____

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

ONE SWMU

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?
- ☐ No corrective action activities initiated
 - ☒ RCRA Facility Assessment (RFA) or equivalent completed
 - ☒ RCRA Facility Investigation (RFI) completed
 - ☐ Corrective Measures Study (CMS) completed
 - ☐ Corrective Measures Implementation (CMI) begun or completed
 - ☐ Interim Measures begun or completed
3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?
- ☒ Operating permit
 - ☐ Post-closure permit
 - ☐ Enforcement order

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

☐ Yes
☐ No
☒ Uncertain; still underway

CONTINUE TO QUESTION 5 ONLY IF THE FOLLOWING CONDITIONS ARE MET:

- The facility ranks "High" on the National Corrective Action Prioritization System; AND -NCAPS-
- Interim Measures have not been initiated, or if initiated, have not been successful in preventing the further spread of contamination at the facility.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?
- ☒ Ground water
 - ☐ Surface water
 - ☐ Air
 - ☒ Soils

Docket Number 448843

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, concentrations, and level of certainty.

POSSIBLY - TCE - CONCENTRATION
LEVELS UNKNOWN - PERMISSION
TO LOCATE OFF-SITE M.W. ON

ADJACENT RAILROAD PROPERTY HAS BEEN
☐ No
☒ Uncertain REQUESTED

7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes
☒ No
☐ Uncertain

7b. Is there a potential for human exposure to the contaminants released from the facility over the next five to 10 years?

- ☒ Yes
☐ No
☐ Uncertain

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☒ Yes
☐ No
☐ Uncertain

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next five to 10 years?

- ☒ Yes
☐ No
☐ Uncertain

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

- ☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

- ☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

- ☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions?

- ☐ Solid
☐ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☒ Dissolved in ground water or surface water
☐ Gaseous
☐ Other _____

13. Are one or more of the following major chemical groupings of concern at the facility?

- ☒ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☐ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☐ Other organics
☒ Inorganics and metals
☐ Explosives
☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

- ☐ Yes; Indicate possible course of action.

☒ No; Indicate why stabilization technologies are not appropriate; then go to Question 19.

GNB HAS A CORRECTIVE
ACTION SYSTEM THAT
IS PROVEN TO BE
EFFECTIVE.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

- ☒ Yes
☐ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

- ☐ Yes
☐ No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

- ☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

- ☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☐ Yes
- ☐ No, not feasible
- ☒ No, not required

Explain final decision, using additional sheets if necessary.

GNB IS CURRENTLY
INVOLVED IN CORRECTIVE
ACTION. GNB HAS A
PUMP & TREAT SYSTEM
THAT IS EFFECTIVE.

Conclusion (Designate facility category below before proceeding with conclusions)

*18. Is this facility an appropriate candidate for stabilization activities?

- () Yes
(X) No
() Cannot tell at this time, additional data needed

Explain final decision, using additional sheets if necessary.

GNB HAS A CORRECTIVE ACTION PROGRAM THAT IS EFFECTIVE

Facility Category for Stabilization Evaluation

____ Category A - Known or expected releases with either known exposures occurring or high potential for exposures to occur (immediate threat).

____ Category B - Known or expected releases with potential for exposures to occur if Stabilization is not undertaken (not thought to be an immediate threat).

X Category C - Known or expected releases, low potential for exposures to occur. Significant continuing releases or migration of releases is likely to cause significant increase in ultimate clean-up cost if Stabilization is not initiated.

For "Yes" answers

Identify specific SWMU's requiring stabilization and the type of releases and summary of data available supporting decision.

For "Cannot tell at this time" answers, specify in detail the type of additional data needed to complete the Stabilization Evaluation and be SWMU specific (i.e. groundwater monitoring data around SWMU #5, old surface impoundment).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4APT-TS

FEB 14 2005

N. Darahyl Dennis
Remediation Project Manager
Georgia Power Company
241 Ralph McGill Boulevard, N.E.
Atlanta, GA 30308-3374

Dear Mr. Dennis:

The U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the Exide Battery Electrical Substation PCB Site Investigation and Remediation Corrective Action Plan (CAP) dated November 28, 2004. The Exide site CAP was submitted to EPA via e-mail by Scott Glen on February 4, 2005. The Exide site CAP was not submitted under the expedited approval process for the 40 CFR §761.61(a) self-implementing polychlorinated biphenyl (PCB) cleanups. However, EPA decided to handle it as such because: a) the source of PCB contamination is assumed to be electrical equipment that contained ≥ 50 part per million (ppm) PCBs; and b) the Georgia Power Company (GPC) proposed to dispose of bulk PCB remediation waste at a state-approved solid waste landfill.

The substation at the Exide Battery site in Atlanta, Georgia measures approximately 20.5-ft. x 27.5-ft. EPA understands that the electrical equipment that was at the site has been removed for reuse or disposal. During the site investigation, GPC collected 52 soil and one concrete sample. Most of the samples were reported as non-detect for PCBs and the maximum PCB concentration was 28.8 ppm. GPC will excavate and dispose of PCB-impacted soil containing PCBs above one ppm. This material will be disposed based on further testing to determine its regulatory status under the Resource Conservation and Recovery Act.

The EPA hereby approves the Exide Battery site CAP pursuant to 40 CFR §761.61(a)(3)(ii). The GPC may proceed with the PCB cleanup subject to the following conditions:

1. The cleanup level for bulk PCB remediation waste (soil and concrete) shall be the *high occupancy areas* \leq one ppm level in accordance with requirements at 40 CFR §761.61(a)(4).
2. Post-cleanup verification soil samples shall be collected and analyzed in accordance with the requirements of 40 CFR §761.61(a)(6) on five-foot grid centers within the excavation areas.
3. The GPC shall submit a final report to the EPA within 60 days of completion of **all** activities described under this approval. At a minimum, this final report shall include a short narrative of

the project activities, **tabular summaries** of characterization and confirmation sampling analytical results, site maps depicting confirmation sample locations and final PCB concentrations, and an estimate of the total acres remediated. The report shall be submitted to the EPA in an electronic format (e.g., compact disk).

4. The GPC shall comply with the recordkeeping requirements specified at 40 CFR §761.61(a)(9) for activities conducted in accordance with this approval.
5. Once cleanup is underway, any change to the plan must be submitted to the EPA for approval prior to the implementation of the change.

Should you have any questions concerning this matter, please contact Craig Brown of the EPA Region 4 staff at (404) 562-8990.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joanne Benante".

Joanne Benante
Chief
Pesticides and Toxic
Substances Branch

cc: Scott Glenn, GPC

Craig Brown/R4/USEPA/US

02/04/2005 09:32 AM

To "Glenn, Scott M." <smglenn@southernco.com>

cc Chris Russell/R4/USEPA/US,

bcc

Subject Re: Emailing: exide battery.dwg, exide battery cap.doc, exide battery cap.pdf

Scott

I've reviewed the PCB cleanup plan for the Exide Battery site substation on the south side of Atlanta. All soil samples collected within the substation contained less than 50 ppm PCBs. Assuming the excavated material is found not to be TC-toxic for lead under RCRA, Georgia Power may proceed with the PCB cleanup action and dispose of the excavated material at a local RCRA Subtitle D landfill, as proposed. I'll follow up with a written approval letter, signed by my Branch Chief.

For future reference, please note that substation cleanup plans should be run through the fast-track TSCA self-implementing PCB cleanup approval process even if there are no hits in soil or concrete at or above 50 ppm PCBs, if: a) the source of contamination is \geq 50 ppm equipment; and b) Georgia Power wishes to dispose of the < 50 ppm soil at a RCRA Subtitle D landfill.

Thanks

Craig

"Glenn, Scott M." <smglenn@southernco.com>



"Glenn, Scott M."

<smglenn@southernco.com>

02/04/2005 09:09 AM

To Craig Brown/R4/USEPA/US@EPA

cc michael.shannon@exide.com

Subject Emailing: exide battery.dwg, exide battery cap.doc, exide battery cap.pdf

Your files are attached and ready to send with this message.

Craig,

Good talking with you this morning.

Attached is the Exide CAP for your review.

All soil is below 50 ppm.

The Exide contact is ;

Mike Shannon at 1-610-921-4063

Email at=== michael.shannon@exide.com

Thanks again

Scott

<<exide battery.dwg>> <<exide battery cap.doc>> <<exide battery cap.pdf>>

[attachment "exide battery.dwg" deleted by Craig Brown/R4/USEPA/US]

[attachment "exide battery cap.doc" deleted by Craig Brown/R4/USEPA/US]

[attachment "exide battery cap.pdf" deleted by Craig Brown/R4/USEPA/US]

Exide Battery Electrical Substation

PCB Site Investigation & Remediation Corrective Action Plan

November 28, 2004

Prepared for:

GEORGIA



Environmental Affairs Department
GEORGIA POWER
Post Office Box 4545

241 Ralph McGill Boulevard
Atlanta, GA 30308

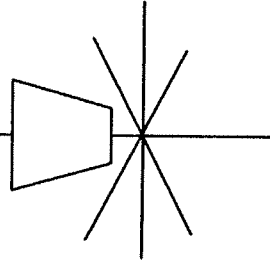
POWER

A SOUTHERN COMPANY

Prepared by:

sbx technologies, llc.

416 Crested View Dr.
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SBX Job No. 1200-140

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Appendix A, Laboratory Analytical Report and Custody Records.

SECTION 1 INTRODUCTION

The Georgia Power Company (GPC) is the operator of the electrical substation located inside the Exide Battery facility at 1246 Allene Avenue Atlanta, Georgia (see Figure 1, Site Location). SBX Technologies, LLC (SBX) was retained by GPC to document the site investigation for the presence of polychlorinated biphenyls (PCBs) and prepare a Corrective Action Plan to remediate the PCB impacted soil inside the electrical substation.

The Exide Battery Substation assessments and Completion Reports (CR) will be implemented and written in accordance with 40 CFR 761, Sampling, Remediation and Disposal of Polychlorinated Biphenyls. To meet the requirements in 40 CFR 761, the horizontal and vertical extent of PCB concentrations in soils must be delineated to background at the Site. Background for PCB's in soils is set at the analytical method detection limit or less (non-detect ND). GPC's final goal is to remove all impacted site soils so that the site soils meet Georgia EPD Regulations for unrestricted use. . A Completion Report will be submitted at the completion of the remediation. A summary of the analytical results is presented in Table 1, Analytical Data Summary.

This Corrective Action Plan summarizes the assessment and planned remediation activities to be performed by GPC to delineate the extent, excavation and disposal of PCB impacted soil identified at the site in accordance with the Toxic Substance Control Act (TSCA) regulatory cleanup-level for bulk PCB remediation.

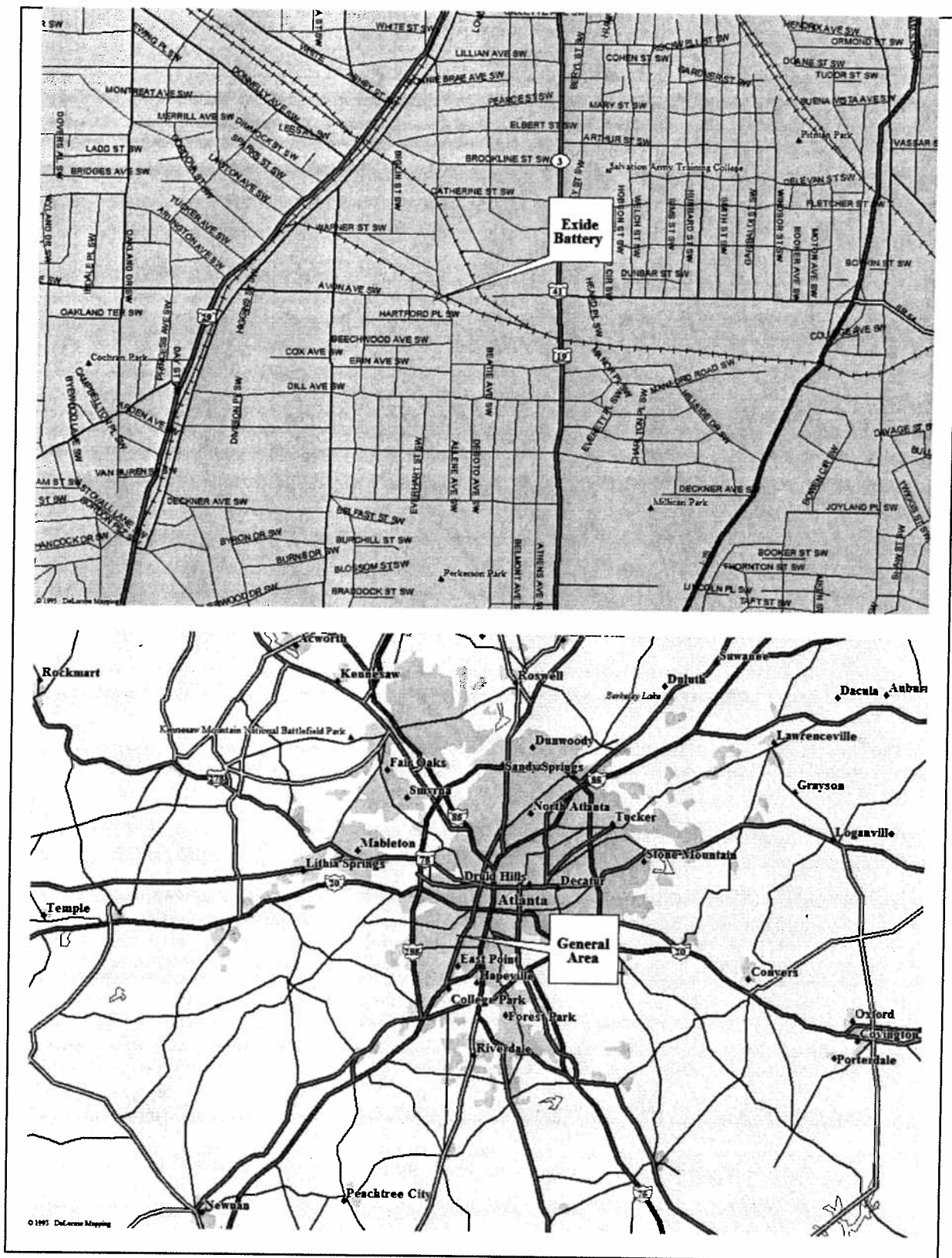


Figure 1

GPC substationExide Battery Site Location

Table 1
Analytical Data Summary
Exide Battery substation

Sample ID	Sample Depth	Collect Date	Result	Units
1	Sample Point @ 0.5	29-Sep-04	28.8	mg/kg
1	Sample Point @ 2.0	4-Oct-04	ND	mg/kg
2	Sample Point @ 0.5	29-Sep-04	8.45	mg/kg
2	Sample Point @ 2.0	4-Oct-04	0.998	mg/kg
3	Sample Point @ 0.5	29-Sep-04	1.66	mg/kg
3	Sample Point @ 2.0	4-Oct-04	ND	mg/kg
4	Sample Point @ 0.5	29-Sep-04	0.689	mg/kg
4	Sample Point @ 2.0	4-Oct-04	ND	mg/kg
5	Sample Point @ 0.5	29-Sep-04	11.7	mg/kg
5	Sample Point @ 2.0	29-Sep-04	ND	mg/kg
6	Sample Point @ 0.5	29-Sep-04	4.33	mg/kg
6	Sample Point @ 2.0	29-Sep-04	ND	mg/kg
7	Sample Point @ 0.5	29-Sep-04	0.555	mg/kg
7	Sample Point @ 2.0	4-Oct-04	ND	mg/kg
8	Sample Point @ 0.5	29-Sep-04	9.21	mg/kg
8	Sample Point @ 2.0	29-Sep-04	ND	mg/kg
9	Sample Point @ 0.5	29-Sep-04	5.91	mg/kg
9	Sample Point @ 2.0	29-Sep-04	ND	mg/kg
10	Sample Point @ 0.5	29-Sep-04	1.33	mg/kg
10	Sample Point @ 2.0	29-Sep-04	ND	mg/kg
11	Sample Point @ 0.5	29-Sep-04	2.79	mg/kg
11	Sample Point @ 2.0	4-Oct-04	ND	mg/kg
12	Sample Point @ 0.5	29-Sep-04	2.85	mg/kg
12	Sample Point @ 2.0	4-Oct-04	ND	mg/kg
13	Sample Point @ 0.5	29-Sep-04	1.84	mg/kg
13	Sample Point @ 2.0	4-Oct-04	ND	mg/kg
Dup-1	Sample Point @ 0.5	29-Sep-04	12.4	mg/kg
14	Sample Point @ 0.5	29-Sep-04	1.03	mg/kg
14	Sample Point @ 2.0	4-Oct-04	ND	mg/kg
15	Sample Point @ 0.5	29-Sep-04	1.11	mg/kg
15	Sample Point @ 0.5	5-Oct-04	2.27	mg/kg
15	Sample Point @ 2.0	4-Oct-04	ND	mg/kg
16	Sample Point @ 0.5	4-Oct-04	ND	mg/kg
17	Sample Point @ 0.5	4-Oct-04	ND	mg/kg
18	Sample Point @ 0.5	4-Oct-04	ND	mg/kg
19	Sample Point @ 0.5	4-Oct-04	ND	mg/kg
20	Sample Point @ 0.5	4-Oct-04	ND	mg/kg
21	Sample Point @ 0.5	4-Oct-04	0.395	mg/kg
22	Sample Point @ 0.5	4-Oct-04	ND	mg/kg
23	Sample Point @ 0.5	4-Oct-04	6.52	mg/kg
23	Sample Point @ 2.0	18-Oct-04	ND	mg/kg
24	Sample Point @ 0.5	4-Oct-04	1.09	mg/kg

Table 1, (Continued)
Analytical Data Summary
Exide Battery substation

24	Sample Point @ 2.0	18-Oct-04	ND	mg/kg
25	Sample Point @ 0.5	5-Oct-04	ND	mg/kg
26	Sample Point @ 0.5	5-Oct-04	ND	mg/kg
27	Sample Point @ 0.5	4-Oct-04	0.365	mg/kg
28	Sample Point @ 0.5	4-Oct-04	ND	mg/kg
29	Sample Point @ 0.5	4-Oct-04	ND	mg/kg
30	Sample Point @ 0.5	4-Oct-04	ND	mg/kg
D31	Sample Point @ 0.5	18-Oct-04	ND	mg/kg
D32	Sample Point @ 0.5	18-Oct-04	ND	mg/kg
D33	Sample Point @ 0.5	18-Oct-04	ND	mg/kg
CP1	Sample Point @ 0.5	5-Oct-04	1.49	mg/kg

2.1 Site Preparation and Layout

The Exide Battery electrical substation boundaries are approximately 20.5-ft x 27.5-ft. The substation property is defined by a chain link fence on all four sides. The substation property will be accessible to GPC and their subcontractor during remedial action activities. The corrective action support area will be situated outside the fence on the asphalt covered section on the North side of the substation. No administration support office trailers are anticipated to be utilized for this remedial action.

2.2 Work Area Description

Based on the analytical results of the assessment sampling, the site was delineated to define the excavation limits. Figure 2, Excavation Map illustrates the horizontal limits of the excavation extending 5-ft to the North, East, and South beyond the fence line and 10-ft to the West. The depth of the excavation will be 2-ft below the ground surface (BGS) throughout the horizontal limits of excavation. The total excavated volume will be approximately 110 (in place) cubic yards (approx. 165 tons) plus the existing concrete footings currently on site.

2.3 Excavation and Removal Sequence

Prior to remedial action operations, the chain linked fence and electrical equipment will be removed. Subsequently, the extent of PCB impacted soil areas identified in Figure 2 will be marked and labeled on the site prior to the commencement of excavation activities.

A small backhoe will be utilized to perform all the excavation, stockpiling and loading activities. The excavated soils will be stockpiled on the asphalt covered area as on the West end of the substation.

2.4 Excavation Stability Methods

The excavation depth area will not extend more than 2 ft-BGS, thus no special sloping will be required nor dewatering measures as groundwater will not be encountered.

2.5 Erosion Control

The substation has a very gentle slope and the excavation area will not require special erosion control methods. A small soil berm may be constructed around the up-gradient perimeter of the open excavation area to prevent precipitation runoff from entering the area if a significant precipitation event is anticipated.

2.6 Material Excavation

General

Excavated materials at the Exide Battery Substation that may be encountered include equipment pads, footings (concrete), gravel and soil. Excavation of non-PCB impacted materials will be kept to a minimum.

On-Site Material Handling

All PCB impacted materials to be excavated are classified as non-hazardous in accordance with TSCA (less than 50 mg/kg) regulations. Due to Exide Battery's manufacturing operations on site, there is the potential that RCRA metals such as lead may be present in the excavated soil.

The excavated material will be stored in separate lined, bermed, and covered stockpiles prior to transportation offsite. Each stockpile areas will be constructed generally as follows:

- An 8-mil plastic sheeting (poly) will be laid on a non-impacted asphalt covered area on the West side of the substation.
- A ring of hay bales will then placed on the poly and underlying poly outside the edges will be wrapped up, over, around and under the hay bales. An entrance into the storage area will be made by leaving out several hay bales on the upgradient side of the hay bale ring. These bales will be replaced at the end of each day, or on days when materials are not being transported.
- A second layer of poly will be placed upon the first, and brought up, over and under the surrounding hay bales.
- The stockpiles will be covered at the end of each day, during precipitation events, and when materials are not being transported in or out of the storage areas, with a third layer of poly that will be wrapped over and under the surrounding hay bales

Disposal

Due to the nature of the manufacturing process at the Exide Battery facility, there is the potential for the presence of lead in the soil. Each excavated section will be stockpiled and a composite sample will be collected in accordance with EPA (Method SW-846) Stockpile Testing Guidelines for TCLP metals analysis prior to disposal. If the TCLP for analytical results for lead are equal to or exceed RCRA limits for hazardous waste, the stockpiled material will transported to the Waste Management TSCA-approved Subtitle C Landfill in Emelle, Alabama. If the TCLP metals results are less than the RCRA hazardous waste limits, the material will be transported to Waste Management's Subtitle D Landfill facility in Pine Bluff, Georgia. Copies of the waste manifest will be maintained on site during remediation activities. Following completion of the remediation, the manifests will be maintained at the GPC Environmental Affairs Department at 241 Ralph McGill Boulevard, Atlanta, Georgia.

Sampling and Analysis Plan

Sampling and analysis will be performed for remediation verification purposes. Verification soil sampling for total PCBs will be conducted upon removal of PCB-impacted soil as shown in the excavation limits in Figure 2. The verification sampling will be conducted in accordance with the USEPA Mega Rule (40 CFR Part 761.61) to ensure that all soil above 1.0 mg/kg has been removed. In accordance with USEPA Mega Rule verification sampling requirements, a 5-ft x 5-ft sampling grid will be laid out within the base of the excavation.

In order to ensure that all PCB impacted soils are removed, confirmation samples will be collected from the bottom of the excavation pit. A confirmation sample is a composite sample consisting of grab soil samples from up to 9 locations from an area in the excavation pit. Each confirmation sample will be designated a single alphabet letter. If the analytical results of a confirmation sample indicated the presence of PCBs, the excavation will be extended deeper at 1-ft intervals until confirmation sample results were reported below the analytical method detection level (ND). Upon receipt of confirmation sample analytical results indicating a concentration below the cleanup criteria, the excavated areas will be backfilled and compacted with clean soil to the original grade.

APPENDIX A

Analytical Laboratory Reports

Fast Track Approval for Less 50ppm

From: Dennis, N. Darahyl
Sent: Friday, February 04, 2005 10:39 AM
To: Williams, Wanda F.; Asti, R. David; Boddie-Duncan, Julia; Glenn, Scott M.; Hobbs, B. J.; Mitchell, Robert W. (Brett); Nix, Dennis R.; Moraitis, Emilia A.; Rickerson, G. C. (Skip); Routman, Rochelle I.
Subject: RE: Emailing: exide battery.dwg, exide battery cap.doc, exide battery cap.pdf

This is a new requirement

-----Original Message-----

From: Glenn, Scott M.
Sent: Friday, February 04, 2005 9:57 AM
To: Dennis, N. Darahyl
Subject: FW: Emailing: exide battery.dwg, exide battery cap.doc, exide battery cap.pdf

-----Original Message-----

From: Brown.Craig@epamail.epa.gov [mailto:Brown.Craig@epamail.epa.gov]
Sent: Friday, February 04, 2005 9:52 AM
To: Glenn, Scott M.
Cc: Russell.Chris@epamail.epa.gov
Subject: Re: Emailing: exide battery.dwg, exide battery cap.doc, exide battery cap.pdf

Scott

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Thanks

Craig

"Glenn, Scott
M."
<smglenn@southerncor.com>

02/04/2005
09:09 AM

To
Craig Brown/R4/USEPA/US@EPA
CC
michael.shannon@exide.com
Subject
Emailing: exide battery.dwg, exide battery cap.doc, exide battery cap.pdf